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## *Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

## **PG&E CORPORATION,**

- and -

# PACIFIC GAS AND ELECTRIC COMPANY,

## **Debtors.**

- Affects PG&E Corporation
  - Affects Pacific Gas and Electric Company
  - Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

**Bankruptcy Case No. 19-30088 (DM)**

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON REORGANIZED  
DEBTORS' FIFTEENTH OMNIBUS  
OBJECTION TO CLAIMS  
(SATISFIED CLAIMS)**

**Response Deadline:  
October 14, 2020, 4:00 p.m. (PT)**

#### **Hearing Information If Timely Response Made:**

Date: October 28, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1           **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation  
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as  
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases  
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the  
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the  
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5           **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on  
6 **October 18, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable  
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended  
General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020,  
all hearings through September 30, 2020 will be held by video or teleconference. **Parties are advised  
to visit the Bankruptcy Court’s website, at [www.canb.uscourts.gov](http://www.canb.uscourts.gov), prior to the hearing date to  
determine whether the Omnibus Hearing will be conducted telephonically and the courtroom  
will be closed.** If so, all parties who wish to appear at the Omnibus Hearing must make arrangements  
to appear telephonically with CourtCall at 1–866–582–6878 no later than 4:00 p.m. (Pacific Time) on  
the day before the Omnibus Hearing. Further information regarding telephonic appearances via  
CourtCall can be found on the Bankruptcy Court’s website, at the following location:  
[www.canb.uscourts.gov](http://www.canb.uscourts.gov) > Rules and Procedures > District Procedures > Policy and Procedure for  
Appearances by Telephone. Charges have been waived by CourtCall for pro se parties.

12           **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the  
Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Fifteenth  
Omnibus Objection to Claims (Satisfied Claims)*, filed on September 17, 2020 [Dkt. No. 9073] (the  
“**Omnibus Objection**”).

15           **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus  
Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the  
Reorganized Debtors at the above-referenced address or by email at [PGEclaims@kbkllp.com](mailto:PGEclaims@kbkllp.com) so as to  
be received by no later than **4:00 p.m. (Pacific Time) on October 14, 2020**. Any oppositions or  
responses must be filed and served as described in the *Order Approving (A) Procedures for Filing  
Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*,  
entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief  
requested in the Omnibus Objection may be granted without a hearing if no opposition is timely  
filed and served in accordance with the Omnibus Objections Procedures Order.** In deciding the  
Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and  
related Adversary Proceedings.

21           **PLEASE TAKE FURTHER NOTICE** that a customized Fifteenth Omnibus Claim Objection  
Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the parties to  
whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

24           **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its  
supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at  
<http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims  
agent, Prime Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll  
free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:  
[pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the  
Bankruptcy Court’s website.

1 Dated: September 17, 2020

2 **KELLER BENVENUTTI KIM LLP**

3 /s/ Peter J. Benvenutti  
Peter J. Benvenutti

4 *Attorneys for Debtors and Reorganized Debtors*

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1                   **Exhibit A**

2                   **Fifteenth Omnibus Claim Objection Notice**

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7 *Attorneys for Debtors and Reorganized Debtors*  
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THE OBJECTION DESCRIBED IN  
THIS NOTICE ASKS THE COURT TO  
DISALLOW AND EXPUNGE YOUR  
CLAIM(S) IDENTIFIED AS  
“OBJECTED-TO” ON THE  
FOLLOWING PAGE OF THIS  
NOTICE.

CLAIMANTS RECEIVING THIS  
NOTICE SHOULD READ THIS  
NOTICE CAREFULLY BECAUSE THE  
OBJECTION MAY AFFECT YOUR  
RIGHT TO RECEIVE A  
DISTRIBUTION ON YOUR CLAIM IN  
THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE  
CONTACT PRIME CLERK, LLC, AT  
(844) 339-4217

THE LAST PARAGRAPH OF THIS  
NOTICE EXPLAINS HOW YOU CAN  
OBTAIN A COMPLETE COPY OF THE  
OBJECTION, AT NO COST TO YOU.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- Affects PG&E Corporation  
 Affects Pacific Gas and Electric Company  
 Affects both Debtors

\* All papers shall be filed in the Lead Case, No.  
19-30088 (DM).

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF THE REORGANIZED  
DEBTORS' FIFTEENTH OMNIBUS  
OBJECTION TO CLAIMS (SATISFIED  
CLAIMS)

Response Deadline:  
October 14, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: October 28, 2020

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic Appearances Only  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 [Claimant Name]

2

Objected-To Claim(s)					Basis for Objection
Date	Claim #	Debtor	Classification	Amount	

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6 On September 17, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors  
7 and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the  
8 “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed  
9 their *Fifteenth Omnibus Objection to Claims (Satisfied Claims)* (the “**Omnibus Objection**”) with the  
United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the  
“**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided  
below.

10 **Any Response (as defined below) to the Omnibus Objection must be filed and**  
11 **served upon the Reorganized Debtors’ Counsel by October 14, 2020 (the**  
12 **“Response Deadline”);**

13 **Any Response must be accompanied by any declarations or memoranda of law any**  
14 **responding party wishes to present in support of its position;**

15 **If there is no timely Response, the Bankruptcy Court may enter an order granting**  
16 **the Omnibus Objection to your Proof(s) of Claim by default.**

17 **If you file a timely Response, the Hearing will be held at the date and time shown**  
18 **below. If factual disputes are presented by the Objection and the Response, the**  
19 **Hearing will proceed as a status conference; factual disputes will not be decided at**  
20 **the Hearing, but at a future evidentiary hearing that may be set at the Hearing.**  
21 **Issues of a purely legal nature, where facts are not in dispute, may be decided at**  
22 **the Hearing. See Bankruptcy Local Rule 3007-1.**

23 **If you file and serve a timely Response, the date, location and time of the Hearing**  
24 **are:**

25 **October 28, 2020 at 10:00 a.m. (Pacific Time)**

26 **Courtroom 17, 16<sup>th</sup> Floor, 450 Golden Gate Ave., San Francisco, CA**

27 The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy  
28 Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus*  
*Disease Public Health Emergency*, dated March 30, 2020, all hearings through September 30, 2020  
will be held by video or teleconference. **Parties are advised to visit the Bankruptcy Court’s**  
**website, at [www.canb.uscourts.gov](http://www.canb.uscourts.gov), prior to the hearing date to determine whether the Omnibus**  
**Hearing will be conducted telephonically and the courtroom will be closed.** If so, all parties who  
wish to appear at the Hearing should refer to the Bankruptcy Court’s website, [www.canb.uscourts.gov](http://www.canb.uscourts.gov)  
> Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone,  
for current information about how to appear. Reorganized Debtors’ Counsel will, as a courtesy and on  
request, provide by email to those who have filed timely Responses updated information regarding  
how to attend.

1           **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim  
with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

2           **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus  
3           Objection, the Reorganized Debtors seek to disallow one or more of your Proof(s) of Claim (as defined  
4           therein) listed above as “Objected-To Claim(s)” on the grounds that the designated Proof(s) of Claim  
5           has been satisfied or released during or prior to these Chapter 11 Cases in accordance with the  
6           Bankruptcy Code, any applicable rules, or Court orders. If you do **NOT** oppose the disallowance of  
7           your Objected-To Proof(s) of Claim listed above, then you do **NOT** need to file a written Response to  
8           this Omnibus Objection and you do **NOT** need to appear at the Hearing. If you do nothing, the  
9           Objected-To Claim(s) will be disallowed. To the extent your Proof(s) of Claim relates to protective,  
10          unliquidated claims relating to the Reorganized Debtors’ potential post-petition non-performance  
11          under an assumed agreement, you retain all remedies that would have existed had these Chapter 11  
12          Cases not been filed, and the Reorganized Debtors represent that they will not raise any bankruptcy  
13          defenses.

14          **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the disallowance of your  
15          Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in  
16          writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at  
17          PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on October  
18          14, 2020 (the “Response Deadline”)**: You must file the Response through the Court’s electronic case  
19          filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’  
20          Counsel will occur automatically upon ECF filing; and no separate service of your Response is  
21          required. If you do **NOT** have access to the ECF system, service must be made by electronic mail to  
22          the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must  
23          arrange for the Response to be filed with the Court within two business days thereafter. If you do not  
24          have the ability to serve a Response electronically, the Response must be served by mail, express or  
25          some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the  
26          Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or  
27          commercial express service that will make actual delivery not more than two business days after the  
28          Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by  
29          email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number,  
30          the number of the Omnibus Objection, and the fact that a paper Response is being delivered by  
31          express.

32          **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:  
33          (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the  
34          case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the  
35          assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of  
36          Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain  
37          the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal  
38          knowledge of the relevant facts that support the Response; (vi) your name, address, telephone number,  
39          and/or the name, address, and telephone number of your attorney and/or designated representative to  
40          whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vii) the  
41          name, address, telephone number, and email address of the party with authority to reconcile, settle, or  
42          otherwise resolve the Omnibus Objection on your behalf, if any.

43          If the Bankruptcy Court does not disallow your Objected-To Proof(s) of Claim listed above,  
44          then the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a  
45          later date. You will receive a separate notice of any such objection.

1           **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus  
2 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:  
3 (i) by accessing the Bankruptcy Court's website at <http://www.canb.uscourts.gov> [PACER account  
4 required], (ii) for free by download from on the Reorganized Debtors' approved notice and claim  
agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,  
by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com) to  
request a complete copy of the Omnibus Objection, including all Exhibits.

5 Dated: September 17, 2020

**KELLER BENVENUTTI KIM LLP**

6           \_\_\_\_\_  
7           Peter J. Benvenutti

8           *Attorneys for Debtors and Reorganized Debtors*

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